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Wallace Environmental Testing Laboratories, Inc.

December 15, 2000

National Highway Traffic Safety Administration
Docket Management, Room PL-401
400 Seventh Street, SW
Washington, D.C. 20590

RE: Porsche GT3 Petition - Response of Petitioner
Docket No. NHTSA-2000-7965 - 3

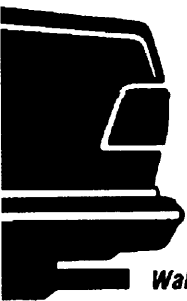
I would like to respond to the remarks made by Porsche Cars North America, Inc., on November 13, 2000. I would first like to state that I feel that Porsche AG, Germany and Porsche Cars North America's comments were vague and ambiguous overall and were an apparent attempt to keep this vehicle out of the United States strictly due to market conditions and not related to safety issues. WETL has been a Registered Importer since the program's inception and finds that the GT3 should not be treated any differently than any other vehicle we have imported throughout the years.

1. **Standard No. 102** - The vehicle for which the petition was submitted complies with this standard in that the shift lever pattern of the *manual* transmission is displayed to the driver, when present, in the driver's seating position at all times.
2. **Standard No. 103** - While I acknowledge the engine is different in the GT3 than on the 911, the functionality of the window defrosting system in the GT3 is as efficient as that found on the 911. Many of the primary components of the system are the same. For instance, the heat exchanger is identical in material make, and part number (996 572 129 00), as is the blower (996 572 903 02). WETL contends the defrosting system on the 911, as installed by Porsche AG in Germany, meets the requirements of this standard as equipped from the factory.
3. **Standard Nos. 105 and 135** - The argument put forth against these Standards is vague and ambiguous. Furthermore, based on our comparison the brakes are equivalent or better than those found on the 911, although the braking system is not identical. Many of the primary components of the braking system on the GT3 are identical in material, make and part number to the 2000-01 Twin Turbo 911 sold in the US market. For example, the front brake calipers (common part numbers 996 351 429 10 (L) and 996 351 430 10 (R)), the rear brake disks (common part numbers 996 352 405 00 (L) and 996 351 406 00 (R)), and the rear brake calipers (common part numbers 996 352 425 60 (L) and 996 352 426 60 (R)). It is my assertion that the GT3 complies with this standard.



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4. **Standard No. 106** - Porsche may in fact be right about the compliance issue on this Standard. We will replace any and all hoses that do not conform to this Standard with complying replacement hoses. We do not believe that Porsche AG Germany would equip a vehicle built for the European market with inferior brake hoses and equipping their US market vehicles with superior brake hoses in comparison.
5. **Standard No. 201** - The vehicle used by WETL for comparison purposes was not equipped with the rollbar. However, even had the vehicle been so equipped, certainly removal of the rollbar is possible. Therefore, this argument does not constitute reason for DOT to determine that this vehicle is ineligible for import.
6. **Standard No. 202** - The vehicle used by WETL for comparison purposes was not equipped with the optional bucket seats. However, even had the vehicle been so equipped, certainly the seats may be removed and replaced. Therefore, this argument does not constitute reason for DOT to determine that this vehicle is ineligible for import.
7. **Standard No. 208** - The statement that the airbag systems are significantly different is, at best, an exaggeration. If, in fact, the components are different, certainly they can be changed. WETL has performed complete airbag installations on many vehicles. To simply remove and replace certain components is easy in comparison. Upon a review of the parts microfiche, there may be more than one airbag unit available for the GT3. However, airbag unit part number 996 803 089 02 is utilized on both the 2000 model year 911 and the GT3.
8. **Standard No. 209** - Seat belts assemblies must be changed.
9. **Standard No. 214 and Part 581** - As stated in our original petition, WETL intends to bring the GT3 to the exact height to which the US certified models were tested for compliance with these Standards. Again, any suspension related parts on the GT3 can readily be changed to the US counterpart.
10. **Standard No. 301** - The fuel tank used on the GT3 is identical to the fuel tank in the 2002 model year certified Porsche GT2 that will be imported by Porsche Cars of North America.



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A response to the anonymous Respondent will not be made other than to state that no Standards are specifically mentioned in the response and on the whole, the statements made are argumentative and ambiguous. In any event, the majority of the issues raised were either covered in this response or in the original petition and need not be further clarified. Any suggestion by either Porsche or the anonymous Respondent that additional requirements be placed upon the importation and conversion of this vehicle are not substantive.

Respectfully submitted,

Les Weaver
Vice President, Operations